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Representing the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN MATTHEW CHAPMAN,

Defendant.

Case No. 2:20-cr-00091-JCM-DJA

**STIPULATION REGARDING
911 CALLS**

Government's Exhibit 2

The United States of America, by and through its counsel, Jason M. Frierson, United States Attorney, Penelope Brady, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Christopher Frey, Assistant Federal Public Defender, counsel for JOHN MATTHEW CHAPMAN, hereby knowingly and willingly stipulate to the following facts:

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1 1. Government Exhibit 2a is a true and accurate recording of the 911 call made by
2 H [REDACTED] L [REDACTED] to the Lincoln County, Nevada dispatcher on October 5, 2019 at approximately
3 4:24 p.m., Pacific time zone.

4 2. Government Exhibit 2c is a true and accurate recording of the 911 call made by the
5 defendant to the Garrett County, Maryland dispatcher Ryan Yoder, on November 15, 2019 at
6 approximately 12:10 a.m., Eastern time zone.

7 3. Government Exhibit 2d is a true and accurate recording of the 911 call made by the
8 defendant to the Bethel Park Police Department dispatcher, William Johnson, on November 15,
9 2019 at approximately 12:13 a.m., Eastern time zone.

10 4. Government Exhibit 2e is a true and accurate recording of the 911 call made by the
11 defendant to the Bethel Park Police Department dispatcher, William Johnson, on November 15,
12 2019 at approximately 1:03 a.m. Eastern time zone.

13 5. Government Exhibit 2f is a true and accurate recording of the 911 call made by the
14 Bethel Park Police Department dispatcher, William Johnson, to the defendant on November 15,
15 2019 at approximately 1:33 a.m., Eastern time zone.

16 6. Government Exhibit 2g is a true and accurate recording of the 911 call made by the
17 Bethel Park Police Department dispatcher, William Johnson, to the defendant on November 15,
18 2019, at approximately 1:55 a.m., Eastern time zone.

19 7. Government's Exhibit 2a, 2c, 2d, 2e, 2f, and 2g are admissible in evidence at trial.

20 8. This stipulation is admissible in evidence at trial as Government's Exhibit 2.

1 The parties have agreed to these facts and the admission of evidence and therefore agree
2 these facts and evidence as have been proved beyond a reasonable doubt.

3 DATED: April 11, 2024

4 Respectfully submitted,

5 JASON M. FRIERSON
6 United States Attorney

7 /s/ Penelope Brady
8 PENELOPE BRADY
9 Assistant United States Attorney

10 RENE L. VALLADARES
11 Federal Public Defender

12 /s/ Christopher Frey
13 Christopher Frey
14 Assistant Federal Public Defender
15 Counsel for Defendant
16 JOHN MATTHEW CHAPMAN

17 IT IS SO ORDERED.

18 DATED April 12, 2024.

19 James C. Mahan
20 HONORABLE JAMES C. MAHAN
21 UNITED STATES DISTRICT JUDGE
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